

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
*Executive Director*

*Southern District of New York*  
Jennifer L. Brown  
*Attorney-in-Charge*

May 22, 2023

*By ECF*

Honorable Paul A. Engelmayer  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 11201

*Re: United States v. Haljoubey Dunlap, 23 Cr. 197 (PAE)*

Dear Judge Engelmayer:

I write on consent (Assistant U.S. Attorney Aline Flodr) to respectfully request that the Court adjourn the conference currently scheduled for May 30, 2023, and schedule a change-of-plea hearing for June 5, 2023, at 3:15 p.m., or another time convenient for the Court.

On April 24, 2023, the Court held the initial conference in this matter. At that time, the Court set a deadline of May 30, 2023 for counsel to apprise the Court of any pre-trial motions it planned to file, and a trial date of July 10, 2023. Mr. Dunlap does not intend to file any pre-trial motions, and instead intends to enter a guilty plea pursuant to a *Pimentel* letter provided by the Government. Accordingly, I respectfully request that the Court schedule a change-of-plea hearing. After consulting with Chambers, I respectfully request that it be scheduled for June 5, 2023, at 3:15 p.m., or another time convenient for the Court.

If the Court grants this request, I further request that time be excluded under the Speedy Trial Act until the next conference date.

Respectfully Submitted,

/s/  
Martin Cohen  
Assistant Federal Defender  
(212) 417-8737

**GRANTED.** The Court adjourns next week's conference until June 5, 2023, at 3:15 p.m., and excludes time pursuant to 18 U.S.C. 3161(h)(7)(A) for the reasons indicated. The Clerk of Court is requested to terminate the motion at Dkt. No. 21

5/23/2023

SO ORDERED.

  
PAUL A. ENGELMAYER  
United States District Judge